

# EXHIBIT P

**DECLARATION OF LAURA BRION**

I, Laura Brion, declare as follows:

1. I am the Executive Director of Childhood Lead Action Project (CLAP), a nonprofit dedicated to eliminating childhood lead poisoning in Rhode Island.

2. CLAP was founded in the early 1990s by parents of lead-poisoned children, medical professionals, activists, and others who saw how lead poisoning was affecting their communities and wanted to do something to stop it.

3. Many people are at risk of lead poisoning due to the presence of lead in old paint on homes, contamination in soil from leaded gasoline, lead from drinking water pipes, and other sources. Lead is a neurotoxin, and even exposure to small amounts can lead to permanent, lifelong harms. Children are especially at risk; no amount of lead exposure has been proven to be safe. Children can experience a range of negative effects, many of which are irreversible and impede success in school, decrease earning potential and can even increase the likelihood of committing violent crime as a young adult. Put most simply, lead poisoning causes brain damage, with increasing severity due to length and degree of exposure.

4. CLAP works statewide, prioritizing the areas that are hardest hit by lead poisoning. Our community education methods include door-to-door outreach, tabling at community events, and workshops for a variety of audiences. Instead of expecting people to have the time to come to us, we try to find where people most at risk of lead poisoning are likely to be so we can reach them. We also organize families who are affected to work on education and advocacy campaigns to improve

overall conditions. And we help connect homeowners to information about steps they can take themselves and to sources of funding that can help them finance work to make their homes safer.

5. We're also a licensed training provider to teach lead-safe practices to landlords and workers, and we engage in policy and advocacy work at multiple levels.

6. CLAP is a small, but highly effective organization. We have four full-time and one-part time employees. In the past, we've had a number of federal grants through EPA that have made a big difference for our ability to carry out our mission. We've been a good fit for those grants and performed well. In 2005, we were honored to receive an EPA Children's Environmental Health Excellence Award.

7. We have an open grant of \$500,000 through EPA that we can't access right now. The purpose of the grant is to fund a multi-pronged, multi-year campaign to address lead poisoning in Providence. The grant is funded with money from the Inflation Reduction Act.

8. Part of that campaign means providing free trainings on lead-safe practices to workers who are involved in renovating old homes and doing work that may disturb old lead paint. We teach them to work safely so that they can protect themselves and those living in the homes they work on.

9. Part of the campaign also involves bringing together state and city officials, along with community members, to develop and execute on a plan to bring landlords into compliance with lead-safety laws. It will also include lead safety

workshops for landlords, neighborhood canvassing, and a training program to educate community health workers about lead poisoning hazards so they can identify those and teach families how to address them.

10. The goal of the project is that all these efforts will complement and reinforce each other in order to turn some of these homes and areas of the city from being dangerous for lead exposure to being a safe place for little kids to grow up. We were phenomenally excited when we got the grant because this really represents a step up for CLAP; it would allow us to scale up our work to a new level in order to help so many more people than we could before.

11. CLAP began to draw down grant funds in December 2024 and January 2025—about \$ 49,745. But that didn't last long.

12. In late January, we lost access to the funds. Sometimes, we were blocked entirely from accessing the online portal, ASAP, which is what EPA uses to disburse money for grants. Other times, we could log into the portal, but our grant was missing. We reached out to tech support for the ASAP system, to our grant office, to everyone we could think of. At one point, tech support said our grant had been suspended and that we would need to contact EPA. EPA acknowledged it was happening, but didn't give a reason why.

13. We kept trying to access the grant, and on Friday, February 7 we regained access through ASAP. But on Monday, February 10, the grant had disappeared again in ASAP. I have heard of other grantees who experienced the same thing.

14. Access turned back on 9 days later, but by March 10, it was back off again. I noticed that the grant became frozen again just a few days after the district court in *New York v. Trump* entered an injunction that seemed to apply only to the states, but not to groups like CLAP.

15. Right now, we're back where we were about a month ago: We can log into ASAP, but the grant is missing. EPA has not explained why. I have not gotten anything from them about termination.

16. If the grant remains frozen, we're not going to be able to carry out our planned initiative in Providence, or at least not on nearly the same scale. CLAP does not have a big budget, and that \$500,000 was huge for us and our work.

17. We had immediate plans to launch a big door-to-door outreach campaign to connect with tenants and homeowners starting as soon as the weather warmed up enough this spring—to talk with them about topics including lead hazards, short-term lead safety methods to immediately reduce contamination, and financial assistance available to address lead hazards in the medium and long term. This represents information and a connection to resources that could make the difference between a child growing up safe and healthy and a child suffering irreparable harm.

18. We have already had to scale back recent plans for grant-funded trainings and workshops, as described below. Even if we are able to do some of what we wanted, we're not going to be able to pursue the multi-front strategy we've planned, which means each piece is going to be significantly less effective than if

they all worked in tandem. That hurts our core mission and the kids and adults we're trying to protect.

19. The way the grant works, CLAP draws down funds from EPA to cover grant-related expenses within five business days of when those expenses occur. What that means is that we need to be able to access the grant reliably and predictably or it's almost like not having it at all. We can't incur big upfront costs only to find out later that we can't get reimbursed with money from the grant that was awarded to us.

20. Already, the disruption caused by the freeze of this grant has hurt us. The full scope of the grant-funded work we expected to carry out in early 2025 was impossible due to the uncertainty and lower staffing than expected caused by our inability to access grant funding when we needed it. CLAP planned to add another full-time position to our staff with the money from the grant, but I've had to hold off on doing that. I can't hire someone if I have no idea if I'm going to be able to pay them. That means we're missing that extra set of hands we'd planned on, which makes all our work harder and stretches our existing staff and resources thinner.

21. The other piece of this is that I would need to be transparent about the situation even if we were to be able to hire someone. I'd have to tell them when they applied about the uncertainty that we'd be able to count on federal grants in the future. And that's going to make CLAP less competitive for getting the best candidates we possibly can and bringing someone on board who can help expand our capacity to carry out our mission.

22. We also had to postpone plans to schedule the first series of lead safety workshops for community health workers to be supported by this grant. The trainees we would have recruited from partner social service agencies and community groups have broad community networks and caseloads and would have been able to help to share information about lead hazards and prevention resources with families at risk. In turn, families could then take action and get help before their children were lead poisoned, or before children already affected suffered further exposure.

23. We know from past experience that this is a highly effective, “train the trainer” community education method that leverages funds and resources beyond the investment of a single grant or funder.

24. The delay in implementing these plans means that there are families who would have been reached and helped sooner, won’t be reached in time to prevent significant harm, or may never be reached at all. Childhood lead exposure can cause permanent damage in a single day, and only gets worse the longer it continues.

25. We also ended up with a waiting list of workers who wanted to take our grant-funded Lead Paint Renovation, Repair, and Painting Rule trainings. In these classes, we teach workers and DIY homeowners and landlords how to stay safe during repairs on pre-1978 homes that may contain lead paint. This course is required by law for many jobs and gives workers the skills they need to protect

themselves, their own families, and the families who will live in the homes they are working on from the dangers of lead paint dust.

26. Because of the grant drawdown pause, we were unable to change our existing schedule to add additional trainings that would have been supported by our EPA grant, despite the demand. We have been unable to train as many local workers to conduct lead-safe repairs as we would have otherwise. At a minimum, this means that lead-safe repairs on local homes may have been delayed.

27. On top of this, multiple staff and board members had to devote unexpected effort to monitoring grant drawdown access and to developing, implementing, and adjusting contingency plans needed to manage this unprecedented level of uncertainty—for both the grant-funded project and the organization overall. This meant extra, unnecessary stress and time taken away from other important activities.

28. These challenges have resulted in a delay in the progress we reasonably expected to make towards improving lead hazard awareness, increasing local compliance with lead safety rules, and ultimately preventing childhood lead exposure during recent months. Our work is all about empowering stakeholders throughout the community to work together to prevent lead poisoning, and the timing is critical. The sooner we act, the more children are protected from the permanent harm caused by lead exposure. Even if our access to grant funding is fully restored today, as an organization and a community, we can never get this time back.

29. In short, the drawdown pause has hampered progress towards our mission of eliminating childhood lead poisoning. This damage will increase if our access to grant funding continues to be blocked. Immediate restoration of our grant funding can prevent future harm and is urgently needed.

30. Going forward, even as we continue to do our best to work as effectively as we can, the reduced capacity caused by the pause means that every day, more local children will be at risk for longer than they would have been otherwise. This has the potential to leave a long-lasting impact on our organization, local children and families, and the community overall.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Providence, Rhode Island, on March 17, 2025.



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Laura Brion